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April 14, 1998

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

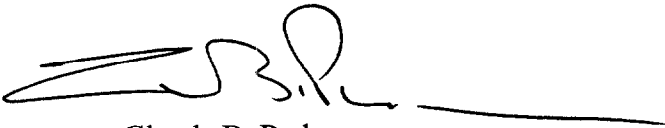
RE: Comments - FCC RM-9242

Dear Office of the Secretary:

Please find attached my comments regarding RM-9242. I have included the original and nine (9) additional copies so that my comments can be formally considered by the Commission in this proceeding.

Thank you for your assistance in this regard.

Sincerely,



Claude B. Parker
WA5Z
(281) 484-5734

cc: Phil Gramm, Senator
Kay Bailey Hutchison, Senator
Sheila Jackson Lee, Congresswoman

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service

FCC RM-9242
Comments of Claude B. Parker, WA5Z

The Federal Communications Commission receives more than 13,000 inquiries per year from individuals and groups wishing to start a "low power" or "Micro power" radio station for local broadcasts (ref. FCC Web Page <http://www.fcc.gov/mmb/asd/lowpwr.htm>). Current provisions for low power broadcasting as outlined in 47 CFR are much too restrictive and outdated. These current rules only allow for very weak signals with a range of only several hundred feet.

To best serve public interest, the Commission cannot ignore the will of the citizens to of which we have intrusted it. As such, the Commission should consider RM-4292 and change the Rules to permit licensed low power broadcasting. The FCC should grant such privileges without a complicated and costly licensing process to any individual or group, using the same criteria and guidelines now used to grant individual licence holders, provided they are United State citizens and not associated with any other commercial broadcast interest.

As a 25-year veteran of commercial radio broadcasting in the Houston market, mostly in a management capacity, I can honestly maintain that many, if not most commercial radio stations, program to the best interest of its principals and not the general public. As you know, broadcast facility ownership rules were changed by the Commission allowing for multiple station ownership. Such rule making has created changes in the complexion of the broadcast industry that clearly serves to benefit large broadcast entities and has thus allowed for the creation of literal broadcast monopolies. In Houston, Texas, for example, I am aware of only one locally owned radio station (KCOH AM) still in existence.

I believe the commercial broadcast industry is against the proposition of low power broadcasting because of greed and its fear that such authorization will dilute audience market shares that may result in profit reduction. Further, corporate executives make out-of-market programming decisions for radio station properties with no desire to satisfy the overall public interest of the market to which the stations are licenced. The only real goal is to produce profits. This is done without regard to the need to develop and maintain community oriented programming.

We have become a very diverse society. Many markets such as Houston have become a melting pot of many different cultures and subcultures within their populations. Currently, most licensed broadcast stations can no longer appropriately meet the needs of each individual community within its coverage area. Traditionally, these stations bury public access and public affairs programs during least listened

to times, such as Sunday morning from 4am-5am. These broadcasts are really only to fulfill a licence commitment and I believe such practices are far from operating within the public trust, even if these they are not "technically" violating the rules. In any case, low power broadcasting would better facilitate the needs of the communities in which they could be licensed by narrowing the scope of programming to fit individual community diversity. Low power stations could address the more specific needs and interests of the populations within their limited coverage area.

Low power broadcasting may also provide better and more specialized services to the public that would not serve profitable for current broadcasters, such as;

- A. Traveler's Information broadcasts to include alternate traffic route and safety information
- B. Local community news & bulletins
- C. Narrowed programming of specific community interest allowing all community members to "have a voice" and be heard.

Finally, the commonly used arguments that low power broadcasting may interrupt or interfere with public service and aircraft communications thus creating a safety hazard is totally inaccurate. With today's technological advancements and state of the art transmitting equipment and filters, even higher power authorization over the limits requested in RM 4292 would not be a matter of concern. In fact, even inexpensive equipment now meets reasonable technical levels of performance. Such facts have been demonstrated during experiments that I and others have been recently associated with. These experiments even included a licenced experimental 24-hour low power operation with no reported problems of any kind with regard frequency stability, or interference to other services.

Without continuing a history of catering to the large commercial broadcast interests, as a governmental agency "for the people, by the people," the Commission must let the people decide what is best for themselves by relaxing the current ban on low power broadcasting. The public wants and deserves reasonable authorization by the FCC to permit legal low power broadcasting. I believe the Commission has an obligation to promptly act in this regard. Therefore, it is my prayer that the Commission will grant such rights to all U.S. Citizens who should so desire to operate a low power broadcast radio station.



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